



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 08/20/2022 | Report No: ESRSA02302



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Afghanistan	SOUTH ASIA	P178758	
Project Name	Education Emergency Response in Afghanistan (EERA)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Education	Investment Project Financing	5/17/2022	9/30/2022
Borrower(s)	Implementing Agency(ies)		

Proposed Development Objective

The Project Development Objective (PDO) is to support access to learning opportunities for girls and boys and improve learning conditions in project-supported schools

Financing (in USD Million)	Amount
Total Project Cost	100.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

Yes

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

This is a short-term off-budget provision of support to the education sector implemented by UNICEF, with funds flowing outside of the ITA systems and with great coordination across donor platforms. This 18-month emergency project is essential to safeguard education achievements obtained over the past 20 years and to contribute to future nation-building efforts. The project design is built with the flexibility required to respond to an evolving sector context, implementation realities and challenges on the ground, data availability, findings of monitoring activities, and ongoing operational lessons learned and takes into consideration UNICEF's existing capacity as the implementation agency for the project. This project has the following components:

Component 1: Support Access to Learning Opportunities



The objective of this component is to maintain access to basic education for all children, with a special focus on out of school children and secondary females students, through support to Community Based Education as well as other education programs in communities through provision of Block Grant.

Component 2: Improving Learning Conditions

This component aims to improve learning conditions at project-supported schools through provision of safe and inclusive learning spaces for all children by the gender-focused rehabilitation of school infrastructure, provision of High Performing Tent as well as Teaching Learning Materials. Eligible school infrastructure improvement will include WASH facilities (water points, sewage system, handwashing facilities, and gender-segregated toilets to encourage girls' enrolment), and the construction of boundary walls to guard the perimeter of schools. This component will also provide High Performing Tent for schools without buildings and/or over-crowded schools as well as Teaching Learning Materials for teachers and students.

Component 3: Strengthening monitoring and ensuring accountability

The aim of this component of the project is to ensure continued access to general education services for target children.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The geographical coverage for this project is nationwide and will target all 34 provinces in Afghanistan for teachers' stipend and Community based education components. In addition, the project aims to construct gender-focused WASH facilities and boundary walls in selected schools that were identified under the previous Bank financed Education Quality Reform in Afghanistan Project (EQRA). All the project related activities including school construction work were on-going before the August 15, 2021 political shift. Therefore, it is anticipated that the shift in the political regime would not pose any additional risk to the implementation of the proposed project.

In Afghanistan, important gender gaps remain in the education sector; only 43% of girls are enrolled in primary education, and 34% of girls in lower secondary schools, as compared to 62% in primary and 55% in lower secondary for boys, respectively. In addition, while access has improved for both girls and boys over the past 10 years, the pace of progress has been slower for girls than for boys. This is mainly due to (i) cultural norms, (ii) lack of female teachers, (iii) lack of infrastructure (including school buildings and proper WASH facilities), and (iv) insecurity (including distance to schools, lack of boundary walls in schools, etc.). The number of out-of-school children is also alarming. The recent COVID-19 crisis as well as increasing insecurity induced by FCV context has brought the estimated number of out-of-school children from 3.5 million (2016-17) to 4.2 million (2019-20). The August 15, 2021 political shift has negatively impacted education service delivery at all levels. While primary schools (grades 1-6) have officially reopened for both boys and girls, secondary schools (grades 7-12) have officially opened for boys and only partially opened for girls in 9 to 11 out of 34 provinces. In addition, many of the CBE programs, which were mainly funded through Development Partners (DPs) to support out-of-school children, are suspended in many provinces.

D. 2. Borrower's Institutional Capacity

The Project will be implemented by UNICEF. The agency has gained experience over the past two years in preparing and implementing environmental and social (E&S) instruments and documents in compliance with World Bank ESF



requirements for projects, specifically those in emergency and FCV contexts. UNICEF has implemented three projects in Yemen related to human capital, social protection, COVID- 19 emergency response, and education, and two projects on provision of essential health services and COVID 19 emergency response and health systems preparedness in South Sudan. Through implementing these projects, UNICEF has demonstrated its capacity to comply with ESF as well as prepare and implement Environmental and Social Commitment Plans (ESCPs), Stakeholder Engagement Plans (SEPs), Environmental and Social Management Frameworks (ESMFs) and related documents. UNICEF has standard contracting documents for implementing partners and contractors, where ESF plans, measures and codes of conduct are included as part of the contract bidding processes for contractors to ensure E&S risks are addressed at all levels. This demonstrates UNICEF's ability to ensure that ESF standards are cascaded down through its implementing partners and contractors.

UNICEF's E&S policy is contained in its draft Social and Environmental Sustainability Standards and Procedures (SESSP). While these policies are mostly well aligned with the World Bank's ESF in substance, there are a few gaps. Some of the standards like those pertaining to labor, biodiversity conservation and cultural heritage have less details than that of the World Bank's ESF. Specific provisions like the requirement for a Labor Management Procedure (LMP), provisions for community workers, and chance find procedures are not included in UNICEF's standards. UNICEF's gender policies also do not provide for a specific SEA/SH risk assessment tool like the one which is used by the World Bank. They also do not mandate a Code of Conduct covering SEA/SH in projects. As the EERA project will follow the ESF, further granularity of these gaps will be described and specific measures will be included in the ESMF to ensure compliance with the ESF.

UNICEF has continued its presence and activities in Afghanistan after the collapse of the previous government administration in August 2021. Therefore, it has a very good understanding of the current situation and the ground realities in Afghanistan. It has 13 offices in Afghanistan including Kabul and provinces with 396 staff. Two hundred and fifty-eight of these staff are nationally recruited which provides UNICEF with excellent capacity to implement projects on the ground. The number of female staff is 96. Another noteworthy strength of UNICEF is that it has developed a robust mechanism through agreements with mobile service companies to use SMS text messaging termed Rapid Pro in Afghanistan to communicate with project beneficiaries. Along with strong in-country presence, UNICEF is able to leverage expertise from its headquarters, regional offices and hire consultants as required to draft the ESF documents. UNICEF at field level operates on a focal person basis for coordination of E&S implementation. However, there is no dedicated/specialized E&S experts in Afghanistan office of UNICEF. The agency will need to hire dedicated local E&S specialists who will be primarily responsible to ensure compliance with relevant E&S instruments. There is a pool of well-trained local E&S experts who worked in the previous World Bank (WB) funded projects. Thus, UNICEF will be able to mobilize required E&S staff for the EERA project implementation.

For community-based education component, local NGOs will be hired. At this point, no implementing partners have been identified. However, over the last two decades, bi-lateral and multi-lateral development partners have funded a number of NGOs to implement basic service delivery and livelihood programs including health and education support. Thus, there are NGOs and their personnel on the ground who have good capacity to implement mainly the CBE component of the project. UNICEF will need to train the designated employees of the implementing partners to apply the environmental and social management measures covered in the ESMF as well as stakeholder engagement plans.

World Bank will engage a Third-Party Monitoring Agency (TPMA) to undertake independent results verification of subprojects funded under the project. The TPMA will report quarterly on the activity outputs, the restoration of



services for the intended beneficiaries, and the fiduciary and safeguard processes followed by the local partners. The TPMA will monitor and report on implementation and compliance with the ESMF and other environmental and social risk management measures and instruments that will be prepared as part of project implementation.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Moderate

The environmental risks of the project are considered “Moderate”. Components one and three of the project (support access to learning opportunities and strengthening monitoring and ensuring accountability)) mainly include costs for community-based education and innovative block grant program to promote the inclusion of girls in secondary and higher levels of school, and thus are not likely to cause any significant or adverse environmental impacts. The project’s key environmental risks and impacts are related to minor civil works under component 2 (Gender-focused rehabilitation of school infrastructure). The potential environmental risks include (a) issues relating to on-site storage of construction material; (b) storage and disposal of construction waste; and (e) generation of noise and dust during construction. As the works are minor and confined within the existing footprint, they are not likely to generate significant adverse environmental impacts. The potential impacts are predictable, and expected to be temporary, reversible, low in magnitude, site-specific (limited to the immediate surroundings), and can be managed through the implementation of the standard and readily available mitigation measures. The eligible school infrastructure improvement under the project will include the provision and setting up of high-performance tents, WASH facilities (water points, sewage system, and gender-segregated toilets to encourage girls’ enrolment), and the construction of surrounding boundary walls to guard the perimeter of schools and would result to positive environmental and health and safety impacts to teachers, students, support staff and visitors.

Social Risk Rating

Substantial

The social risks are considered “Substantial.” The key social risks include: (a) possible tension and conflicts among beneficiary communities and districts; (b) corruption and non-transparency in implementing Component 2 (CBE); (c) increased exposure to Covid 19 virus to children, teachers, and communities due to lack of masks, social distancing, low vaccine coverage for teachers and students; (d) high SEA/SH risks in schools; (e) safety risks to building users (students/teachers/visitors/other support staff) during execution of construction work; (f) occupational health and safety risks to workers during construction; (g) minor labor influx affecting security and mobility of girls and women within the school and larger community; (h) minor loss of assets/land; (i) low capacity of NGOs and contractors to manage E&S risks following ESF and (j) exclusion and discrimination of potential beneficiaries. The possible occurrence of conflict (including armed conflict) and/or terrorist attacks on schools/project workers is also an important contextual risk that may affect the safety of the project actors. Furthermore, the project initiative to provide tents for students could result in additional life and fire risks. Overall, the project activities are expected to have significant positive social impacts on the education sector in Afghanistan as they will safeguard education achievements obtained over the past 20 years and contribute to future nation-building efforts. This project will also ensure that learning continues, in a safe and secure environment for all children.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered



B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

This standard is relevant. The proposed construction works will include the provision and setting up of high-performance tents, WASH facilities, and boundary walls in selected schools. Environmental and social impacts during construction would include dust, noise, work-site and community health and safety, Life and Fire Safety, waste generation, labor issues, and storage and disposal of wastewater related to WASH facilities. Component 2 (rehabilitation work) may also have potential social risks/impacts such as child labor, forced labor, and possible risks of excluding children from poor and vulnerable groups and individuals displaced by the ongoing conflict and security situation in the country. Furthermore, the risk of exclusion and nepotism during the selection process of NGOs is also considered a potential risk, which will be addressed by applying clear and transparent selection criteria and an inclusive and participatory decision-making process to ensure a fair and transparent selection process.

An Environmental and Social Commitment Plan (ESCP) and a Stakeholder Engagement Plan (SEP) have been prepared and will be disclosed by appraisal together with this ESRS. The ESCP outlines the commitment of UNICEF, which will be cascaded down to implementing NGOs and contractors, to screen, assess and manage E&S risks and impacts while the SEP embodies the consultation, information disclosure, and engagement processes to be undertaken by the project throughout at all stages of the project implementation.

An Environment Social Management Framework (ESMF) will be prepared. The ESMF will include an E&S screening template, a generic ESMP to manage the impacts of minor rehabilitation works, a simplified LMP, a simplified Resettlement Framework (RF), and measures to manage OHS and CHS risks, including EPR and L&FS. The ESMF will have an exclusion list for project activities that will not be supported by the project, monitoring and supervision, reporting requirements, capacity building and training, and cost estimation provision. It will also include a brief description of the UN Security Protocol and any measures necessary to ensure consistency between the Protocol and the ESF requirements. In addition, UNICEF will prepare a SEA/SH action plan. The generic ESMP will include mitigation measures to address construction waste management and pollution control including wastewater management, OHS, Covid-19 Infection Prevention and Control (IPC), labor issues, SEA/SH risks management, and other environmental and social impacts that may arise during the project operational phase. The contractors and/or NGOs will conduct the E&S risk screening of each sub-project under component 2 and implement site-specific mitigation measures following the generic ESMP. However, as the Project is being prepared under Paragraph 12 of IPF Policy, for Projects in the situation of urgent need of assistance, the preparation of the ESMF will be deferred to the implementation stage but before signing of any contract between UNICEF and NGOs/contractor who will be implementing the project activities.

The implementation of E&S instruments will be regularly monitored and reported on by UNICEF. As part of broader monitoring oversight, the existing Third Party Monitoring Agent (TPMA) will be engaged for E&S risk management monitoring. The TPMA will provide quarterly reports covering the field-level E&S issues.

ESS10 Stakeholder Engagement and Information Disclosure



UNICEF has prepared a Stakeholder Engagement Plan (SEP) in accordance with ESS10 and in line with the principles outlined in UNICEF's Social and Environmental Sustainability Standards. The SEP lays out the plan for meaningful consultations and engagement with all stakeholders throughout the project lifecycle. The SEP describes the strategy and specific methods of engagement that would facilitate the effective participation of the different affected groups. The SEP delineates the roles and responsibilities for the implementation of the SEP, as well as monitoring and reporting Mechanism(s). It describes the principles, processes, and structures of the project-level grievance redressal mechanism(s) (GRM).

For this project, the key stakeholders include primary and secondary school teachers, school administrators, students, and their parents, community members and leaders including religious leaders (Mullah Imams) as well as relevant NGOs and CSOs and contractors. Due to the emergency situation and COVID-19 constraints, the SEP has been prepared with limited consultations. SEP is considered as a live document that could be updated during the project implementation based on ongoing consultations. UNICEF will continue to identify and engage, through meaningful consultations, with all stakeholders, paying special attention to the inclusion of women, vulnerable and disadvantaged groups. The SEP acknowledges the challenges of engaging with marginalized and vulnerable social groups such as internally displaced persons (IDPs), returnees, pastoral nomads, and those living in remote or inaccessible areas and proposes strategies to engage with them.

The Project will also ensure that information disclosure takes place in an ongoing and satisfactory manner with clear and accessible messaging on principles of fair, equitable, and inclusive access to education. While the channel of communication may be restricted to electronic/ virtual methods so that face-to-face interaction is minimized or avoided, the Project will ensure that stakeholder engagement takes place on an ongoing basis, at different levels, with different partners, and in a culturally appropriate manner. UNICEF will take the advantage of its existing SMS text messaging-based grievance redress mechanism, Rapid Pro to communicate with project beneficiaries. Rapid Pro will also be a part of the project's GRM as mentioned in the SEP.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

ESS2 is relevant. The project implementation will involve direct workers and contracted workers. A simplified Labor Management Procedure (LMP) will be prepared as part of the ESMF prior to UNICEF entering into a contract with Implementing Partners to guide the minimization and mitigation of labor-related risks and impacts.

The project will be conducted mainly by direct workers and contractors of the Project such as community-based educators, employees of implementing partners, and construction workers. While the number of workers may not be estimated at the current stage, no large-scale labor influx is expected. The key occupational health and safety risks are in relation to the contamination with COVID-19 because of the high risk of contagion, low vaccination rates, and potential exposure risks of all project actors exacerbated by poor adherence to Covid 19 safety measures (e.g., masks, social distancing). Labor-related issues also include child labor, discrimination, working conditions, and risks associated with SEA/SH.



During the project implementation, labor management-related risks and OHS issues affecting the workers of the implementing agency and contracted workers will be monitored and managed. As all workers will be coming into close contact with communities, the LMP will include a specific SEA/SH code of conduct, prohibiting any form of forced or child labor, as well as a general code for interacting with communities and partners. The Project GRM will be consistent with both ESS2 and ESS10 to enable workers to access it. The use of forced labor or the use of child labor for any person under the age of 18 in hazardous work situations is prohibited and will be regularly monitored by UNOPS and TPMA.

UNICEF, implementing NGOs, and contractors will implement adequate OHS (including emergency preparedness and response measures), LMP and ESMP measures in line with the ESMF and the ESCP. The OHS, LMP, and ESMP measures as spelled out in the ESMF will consider the World Bank Group's General Environment, Health, and Safety Guidelines (EHSGs) as well as ESS2 requirements.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is relevant to the project due to the construction works proposed under Component 2. Activities pertaining to infrastructure improvement of the selected schools would carefully consider resource efficiency and pollution management aspects such as (a) sanitation, (b) water availability and quality, (c) environmentally augmentative measures related to energy and water efficiency, and, (d) waste management (including construction waste). The ESMF will propose measures for efficient use of resources and measures for preventing/ managing pollution, that can be incorporated into civil work designs for improvement/rehabilitation of already existing school buildings, construction, and operation and to avoid adverse impact on human health and the environment. Incorporation of these aspects into the project design and implementation will enhance the quality of the physical environment in the schools, enhance health and safety and reduce the environmental footprint linked to the use and operations of buildings. It is expected that there will be minimal water requirements as well as negligible greenhouse gas emissions from the project.

ESS4 Community Health and Safety

ESS4 is relevant as the proposed activities can pose community health and safety risks and impacts arising from small-scale civil works in selected schools as well as Life and Fire Safety (L&FS) and emergency preparedness and response (EPR) for students, teachers, and employees specifically to ensure the risks pertaining to L&FS are mitigated through a detailed Emergency Preparedness and Response procedures which will be further complemented by evacuation drills. Along with transfers of other communicable diseases, there is also a potential risk of community exposure to COVID-19 infection by the Project workers during the WASH infrastructure and boundary wall construction phase. The pandemic may add to the risks for community health and safety and subsequently households whose children are attending school. The project will exercise appropriate precautions against introducing the infection to local communities. Sub-project activities will be screened and assessed for community health and safety impacts and risks such as issues related to community safety during civil works in schools situated in congested rural and urban areas; restriction of access during construction; health and safety due to works; civil works outside regular working hours etc.



The ESMF will include basic L&FS and EPR checklist to be covered in all facilities as well as applicable COVID 19 restriction measures and protocols to guide safe planning and implementation of construction works. To address the risk of the spread of the Covid 19 virus, the project will include the dissemination of covid 19 safety information at the school level. The ESMF will also include the identification of necessary measures to manage increased traffic to carry goods for construction. Adequate safety training and safety gear will be provided for workers by the relevant contractors with whom they will be working, and road safety issues will be addressed through appropriate provisions in works contracts.

The SEP (see ESS10) will describe respective measures, including engagement with communities when needed, regarding communication and outreach. In order to manage the contextual security risks to beneficiaries and workers, UNICEF will implement and cause the implementing NGOs and contractors to adhere to the UN security protocols and any measures necessary to ensure consistency between the Protocol and the ESF requirements including security risk assessment and any security management measures necessary for the implementation of the Project activities and the provision of security to Project workers, sites and/or asset. The ESMF will include a description of the Protocol and any such measures.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is relevant. The project will not involve any major civil work requiring land acquisition. However, under component 2, the project will involve physical work which may require the use of additional land for the construction of WASH facilities or boundary walls. The expectation is that any additional land will be secured via voluntary land donation. The detailed process of land acquisition through voluntary donation will be described in a simplified RPF chapter of the ESMF.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is not relevant as proposed civil works will take place in existing footprints/building premises.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This standard is not relevant as there are no Indigenous People that meet the criteria of ESS7 in the country that could potentially benefit or be adversely affected by the Project's activities.

ESS8 Cultural Heritage

This standard is not relevant as the project will not have any impact on the cultural heritage, as the rehabilitation of school infrastructure work will be conducted on the existing school infrastructure or proximity. However, the ESMF will include chance finds procedures.



ESS9 Financial Intermediaries

The standard is not relevant as the Project does not include financial intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where "Use of Borrower Framework" is being considered:

Use of borrower framework is not considered for this project.

IV. CONTACT POINTS

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V. FOR MORE INFORMATION CONTACT



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VI. APPROVAL

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Practice Manager (ENR/Social)	Christophe Crepin Cleared on 19-Aug-2022 at 10:20:25 GMT-04:00
Safeguards Advisor ESSA	Pablo Cardinale (SAESSA) Concurred on 19-Mar-2022 at 23:08:38 GMT-04:00